

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1
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RE: DOCKET 98-143

CODE REQUIREMENTS - Ignore the IARU Treaty as Japan does and DO NOT test for ANY CW proficiency! But if you determine the CW requirement is a MUST, the MAXIMUM SPEED for FULL HF access should be 5 WPM. Actually, a speed of 1 (yes one!) WPM would be quite adequate to meet the IARU requirements. Although I am an ARRL member, I hold "no stock" in the survey they supposedly took on CW! I believe all amateurs (except the minority Extra Class) support the elimination or reduction of CW testing speeds to gain HF access. The IARU will drop the CW requirement in a few years anyway. I guess I should mention that I was "Code Tested" at an FCC Field Office at 13 WPM for 1 minute solid in 1964. If you deem that CW testing is still a requirement for HF access, the CW test should be of the "1 minute Solid Copy" type as opposed to the multiple-guess variety.

LICENSE CLASSES - While your proposal for (4) classes is much better than the current class structure, I believe the ARS could be further "streamlined" by going to ONLY TWO classes. "TECHNICIAN"....a NO CODE class with FULL amateur privileges above 30 Mhz and a "GENERAL" class ticket which would be 5 WPM maximum (only if necessary!) and have all the privileges of the current EXTRA class ticket. I think this is "real streamlining!" Only two classes! Only the current NO CODE licenses would be classified as "TECHNICIAN." All others (including current Advanced and Extra) would become the new "GENERAL." This is basically a return to the 1950's sans the "Vanity Class" Extra and the 13/20 WPM. The only amateurs who wouldn't "like" this are the current Extra's. These folks could maintain their "elite" status by qualifying for the ARRL CW Proficiency Awards at any CW speed they like - including LIGHT!

WRITTEN EXAMS - If you absolutely need to maintain more than two classes of license, the difficulty on the TECHNICAL portion of the highest class of license should be greatly increased. The level of electronics expertise required to pass the current Extra class exam is meager at best! Make this exam "full of calculus" if you like. I will be upgrading from my Advanced class as soon as the absurd 20 WPM CW test requirement is dropped. As things are now, bonafide RF Design Engineers are "talked down to" and made to feel "second class" to the Extras who may not be able to build a "crystal radio" but can "beep real fast." It is high time the FCC reserves the highest class of license for those who actually do know "a thing or two" about RADIO! (Spreading sequences as opposed to "tapping two wires together" real fast!"

OLD NOVICE BAND SEGMENTS - As you have proposed, give these over to the MOST POPULAR mode of amateur radio - PHONE OPERATION! If you keep the four class structure as proposed, make sure the current NOVICE class can operate CW anywhere this mode is authorized.....DC to light!

ENFORCEMENT - This is the MOST Important issue facing the ARS today! If in fact, the FCC does not have a "secret agenda" to "eliminate the ARS from within," enforcement absolutely MUST be returned to something akin to the FCC practices of the '50's and '60's! PLEASE DO NOT EVEN CONSIDER PRIVATIZING THIS FUNCTION!!! Things are bad enough as they are! How would you like to ELIMINATE the enforcement function? Follow these two simple steps! 1) Monitor 14.313 (by day) and 3.901 (by night) for a period of 1 month. 2) REVOKE the licenses of violators, CONFISCATE their equipment and give them the choice of a heavy fine or a

prison term. I believe you would find the rest of the ARS would immediately begin "self policing" as practiced before! Of course, these "actions" would have to appear in print in the leading amateur "rag" to have greatest effect." I believe there are only 50 - 70 "radio criminals" in the entire ARS. These few "breed the need" for ANY type of enforcement on HF. If these few had no "daily on-the-air presence" the remainder of the amateurs would quickly adhere to the rules! The FCC could "at least" be pro-active in collecting the unpaid NAL's from certain amateurs. And other amateurs who have had their licenses previously suspended for intentional, malicious interference BUT CONTINUE TO OPERATE AS BEFORE, should have their tickets PERMANENTLY REVOKED! Yes, I'm speaking of K4OKA and WB2OTK...the two most famous "outlaws" of amateur radio. I'm sure I will not be the only amateur to mention their callsigns and the word "enforcement" in the same sentence! Make an "example" of just these two and the entire ARS will benefit greatly! (By the way, it's WB2OTK who has the \$10,500 UNPAID NAL.) The fact that these two are still on the air daily is WORLD-WIDE PROOF THAT THERE IS NO ENFORCEMENT OF THE U.S. PART 97! (Even if a NAL is judged, "you don't really have to pay it!") These issues of code speeds and the number of license classes aren't really important at all when compared to enforcement. That is unless the FCC "wants" to see the ARS become something akin to 27 Mhz. What is the point of having ANY rules if they can't be enforced? Do YOU slow down on the freeway when you see a patrol car? Why is that???? The enforcement of the FCC MUST carry "at least" the same amount of "fear." The current lack of enforcement is destroying the ARS. In the ARS today, every amateur knows "there are NO patrol cars on the road," and so "I can break any damned rule I please!" I realize "beefed up" enforcement would cost money! I (for one) would be willing to pay \$100/year to renew my ticket if I knew this extra revenue would go towards enforcement!

Other than the comments that I've listed above, I'm in agreement with Docket # 98-143. You've opened quite a "can of worms." I appreciate being able to provide comments on your proposal. Just in case anyone's tabulating....I am....W8KTH....Advanced Class.....first licensed as KN3YFU in 1962 at age 11. Amateur Radio led me to my vocation - I've worked as an engineer for 27 years in a Fortune 100 firm doing (among other things) EMC/EMI mitigation and RF Comm Link design. Good Luck in this massive undertaking! I leave you with one final (important) word.

ENFORCEMENT!!!!!!

73!